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Attorney for Defendant  
MICHAEL R. PAPAYANS

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

CORY SPENCER, an individual;  
DIANA MILENA REED, an  
individual; and COASTAL  
PROTECTION RANGERS, INC., a  
California non-profit public benefit  
corporation;

Plaintiffs,

v.

LUNADA BAY BOYS; THE  
INDIVIDUAL MEMBERS OF THE  
LUNADA BAY BOYS, including but  
not limited to SANG LEE, BRANT  
BLAKEMAN, ALAN JOHNSTON aka  
JALIAN JOHNSTON, MICHAEL  
RAE PAPAYANS, ANGELO  
FERRARA, FRANK FERRARA,  
CHARLIE FERRARA, and N.F.; CITY  
OF PALOS VERDES ESTATES;  
CHIEF OF POLICE JEFF KEPLEY, in  
his representative capacity; and DOES 1  
– 10,

Defendants.

Case No. 2:16-cv-02129-SJO-RAO

**DECLARATION OF PETER T.  
HAVEN IN SUPPORT OF  
DEFENDANT MICHAEL  
PAPAYANS' MOTION FOR  
SUMMARY JUDGMENT**

[Fed. Rules Civ. Proc., Rule 56]

Date: August 21, 2017  
Time: 10:00 a.m.  
Place: Courtroom 10C  
350 W. 1<sup>st</sup> Street  
Los Angeles, California 90012

Hon. S. James Otero

I, Peter T. Haven, hereby state and declare:

1. I am an attorney admitted to practice before this District Court and all  
Courts of the State of California. I am the attorney of record for Defendant Michael

1 R. Papayans. I have personal knowledge of the matters set forth herein such that if  
2 called upon to testify I could and would competently state as follows under oath.

3 2. I make this Declaration in support of Defendant Papayans' concurrently  
4 filed motion for summary judgment or in the alternative summary adjudication. The  
5 motion was made following the conference of counsel pursuant to Local Rule 7-3  
6 which took place on July 14, 2017.

7 3. Attached hereto as Exhibit 1 are true and correct copies of the face page  
8 and selected pages of the Certified Transcript of the Deposition of Plaintiff Cory  
9 Eldon Spencer taken on October 11, 2016, which deposition I attended.

10 4. Attached hereto as Exhibit 2 are true and correct copies of the face page  
11 and selected pages of the Certified Transcript of the Deposition of Plaintiff Diana  
12 Milena Reed, Volume II, taken on October 25, 2016, which deposition I attended.

13 5. Attached hereto as Exhibit 3 are true and correct copies of the face page  
14 and selected pages of the Certified Transcript of Deposition of non-party deponent  
15 Christopher Taloa, taken on January 5, 2017, which deposition I attended.

16  
17 I declare under penalty of perjury under the laws of the United States that the  
18 foregoing is true and correct. Executed on July 24, 2017, at Manhattan Beach,  
19 California.

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21 /s/ Peter T. Haven  
Peter T. Haven  
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